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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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IN RE AMERICAN INTERNATIONAL GROUP, INC. 2008 SECURITIES LITIGATION

Master File No. 08-CV-4772 (LTS)

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the undersigned parties, that:

- 1. Defendant American International Group, Inc.'s memorandum of law in support of its motion to dismiss the Consolidated Class Action Complaint shall be no longer than 35 75 pages.
- 2. Defendant underwriters' memorandum of law in support of their motion to dismiss the Consolidated Class Action Complaint shall be no longer than 50 pages.
- 3. Defendant PricewaterhouseCooper's memorandum of law in support of its motion to dismiss the Consolidated Class Action Complaint shall be no longer than pages.
- 4. Defendant Joseph Cassano may file a memorandum of law in support of his motion to dismiss the Consolidated Class Action Complaint not to exceed 25 pages in length.
- Defendant outside directors may jointly file a memorandum of law in support of their motion to dismiss the Consolidated Class Action Complaint not to exceed 25 pages in length.
- 6. Each of the remaining individual defendants may file a memorandum of law in support of their motions to dismiss the Consolidated Class Action Complaint not to exceed 25 pages in length.

- 7. Plaintiffs' memorandum of law in opposition to Defendants' motions to dismiss shall be no longer than the combined total number of pages of the memoranda of law submitted by Defendants in support of their motions to dismiss.
- 8. Defendants American International Group, Inc.'s reply to any opposition shall be no longer than 30 pages.
 - 9. Defendant underwriters' reply to any opposition shall be no longer than 15 pages.
- Defendant PricewaterhouseCooper's reply to any opposition shall be no longer than 15 pages.
- 11. Defendant outside directors may jointly file a reply to any opposition not to exceed 10 pages in length.
- 12. Each of the remaining individual defendants may file a reply to any opposition not to exceed 10 pages.

Defendant Athan's time to respond to the complaint is suspended, and the determination of any page limits as to him in connection with motion practice reserved, pending further order of the Court.

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Notwithstanding the foregoing approved maximum page limits, council are appealed to cooperate to avoid any ennecessary displication of argumentation. Crussel are also reminded of the obligations imposed by paragraph 2B of the indensigned's Individual Practices Rules.

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Co-Lead Counsel for Securities Class Action Lead **Plaintiffs**

SO ORDERED.

Dated: New York, NY

The Honorable Laura Taylor Swain United States District Judge